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FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
)  
Closed Captioning and Video Description )  
of Video Programming )  
) MM Docket No. 95-176  
Implementation of Section 305 of the )  
Telecommunications Act of 1996 )  
)  
Video Programming Accessibility )

COMMENTS OF U S WEST, INC.

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February 28, 1997

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## SUMMARY

U S WEST generally supports expansion of the programming options of the millions of Americans with hearing and visual disabilities. The Commission is considering a general exemption for public, educational, and governmental (“PEG”) programming due to the relatively small production budgets which support PEG programming. U S WEST supports this exemption, and urges the Commission to clarify that it includes local origination programming, as well.

Local origination programming shares many of the attributes of PEG programming. This is particularly true for U S WEST’s domestic cable division, Continental Cablevision. Continental has pioneered a unique approach for local origination programming which it calls “community programming.” Continental has over 150 local origination studios nationwide and 70 in New England alone, many serving individual towns. Like PEG, community programming operates on a very limited budget, relies heavily on local resources for support and reaches small audiences. The imposition of mandatory closed captioning costs on this important community voice would make continued local origination programming impractical. The Commission should ensure the continued viability of this important public outlet by exempting local origination/community programming from mandatory captioning requirements.

The Commission must also place responsibility for closed captioning where it can be most economically and efficiently inserted -- at the point of program production. The Telecommunications Act of 1996 gives the Commission the authority to require program producers and program owners to insert closed

captioning at the time of program production. The Commission should appropriately place the responsibility with these parties. Without such a mandate, there is no way to ensure that closed captioning will be inserted where it is most efficient and cost effective. Placing the impetus for captioning on program distributors is inappropriate and inconsistent with the public interest in this proceeding.

The Commission should provide for a ten-year transition period to allow time for sufficient captioning resources to develop. An expedited transition schedule will only cause captioning demands to exceed supply and raise the captioning costs for all program providers. A shorter transition period may also result in lower overall captioning quality as well-trained resources will initially be in short supply.

Finally, U S WEST proposes that the Commission impose any mandatory closed captioning requirements on a channel-by-channel basis. Such a requirement will eliminate the possibility that captioning will become a negotiating point between programmers and distributors and ensure that closed captioning does not negatively impact channel lineup decisions.

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COMMENTS OF U S WEST, INC.

U S WEST, Inc. ("U S WEST") herein provides comments to the Federal Communications Commission's ("Commission") Notice of Proposed Rulemaking in the above-captioned matter.<sup>1</sup> The recent purchase of Continental Cablevision, Inc. (or "Continental") makes U S WEST the third largest stand-alone cable television distributor in the United States. In addition to the Continental systems, U S WEST owns and operates cable systems in Atlanta, Georgia (through its ownership of MediaOne, Inc.) and Omaha, Nebraska (through its ownership of U S WEST Communications, Inc.). Together, these systems serve approximately five million domestic cable customers. U S WEST also holds a substantial partnership interest (25.5%) in Time Warner Entertainment ("TWE") which owns and manages multiple

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<sup>1</sup> In the Matter of Closed Captioning and Video Description of Video Programming, Implementation of Section 305 of the Telecommunications Act of 1996, Video Programming Accessibility, MM Docket No. 95-176, Notice of Proposed Rulemaking, FCC 97-4, rel. Jan. 17, 1997 ("NPRM").

cable systems across the United States (approximately 12.3 million subscribers) and an array of video program and other production interests, e.g., HBO, Showtime, Warner Bros., etc. Through this range and variety of video distribution and video production interests, U S WEST has a strong appreciation for many of the issues raised by the Commission in this proceeding.

U S WEST supports the directives of Congress in the Telecommunications Act of 1996<sup>2</sup> and the Commission's efforts to expand the programming options of the millions of Americans with hearing and visual disabilities. As a telecommunications carrier, U S WEST has previously supported various technologies and programs to ensure that people of all abilities are able to receive and use a full range of telecommunications services (e.g., Telecommunications Relay Service). A key to the long-term success of such programs, however, is to make sure that they are provided in the most efficient and appropriate manner. This includes ensuring the economic reasonableness of all program initiatives.

Given other important interests and the state of technology and resources available to produce closed captioned programming, a small amount of compromise will result in the better overall achievement of the Commission's goals in this proceeding. While U S WEST agrees that it is important to close caption as much programming as feasible, it is also important to encourage the production of programming from a diversity of sources, including small, local production operations with limited resources. It is also important that sufficient time be

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<sup>2</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 126-28, codified at 47 U.S.C. § 613 ("1996 Act").

provided to allow all program providers to identify and line up resources to provide closed captioning services. The Commission must carefully consider each of these goals to ensure a balanced implementation in this proceeding.

I. THE COMMISSION SHOULD EXEMPT LOCAL ORIGINATION (OR “LO”) AND PUBLIC, EDUCATIONAL AND GOVERNMENTAL (“PEG”) ACCESS PROGRAMMING FROM CLOSED CAPTIONING REQUIREMENTS

The Commission is considering a general exemption under Section 713(d)(1) for PEG access channel programming based on the economic burden closed captioning would place on producers of such programming. In proposing the exemption, the Commission cited the relatively small production budgets which support PEG programming of “high public interest value.”<sup>3</sup> As discussed below, U S WEST supports the exemption for PEG programming. However, for the same reasons it is critical for the Commission to apply the same exemption to local origination programming as well.

A. Local Origination And PEG Access Programming

Over thirty years ago, U S WEST’s domestic cable division, Continental Cablevision, pioneered a unique approach to local programming which combines both LO and community access production on one channel in an important variation referred to as community programming. Under this model, local programming is produced cooperatively by Continental’s professional staff and community volunteers. Because Continental retains the right to exercise editorial control, its

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<sup>3</sup> NPRM ¶ 74.

community programming is deemed LO, although such programming shares many of the features of PEG access programming.

Responding to the desire of local towns to have a voice, Continental has successfully lowered LO costs by relying on trained volunteers and sharing channels. Continental's studios produce non-commercial programming for very small audiences, factors distinguishing community programming from most other programming. Indeed, Continental funds more local studios for its size than any other operator -- over 150 nationwide. In New England alone, Continental operates over 70 studios, many serving a single community.<sup>4</sup>

The requirements for LO/community programming usually are set in franchise negotiations and track equivalent PEG commitments -- 3% to 5% of the gross revenues in a particular franchise. Typically, the license agreement will specify whether the community will have its own studio or will share a studio with another community and whether full- or part-time staffing by Continental personnel is required. Often, Continental is required to produce a minimum number of hours of LO programming per week, to provide staff to oversee the studio, and to provide outreach and training to members of the community. Closed captioning, however, is not required.

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<sup>4</sup> In a number of franchise areas, Continental also provides local programming by funding PEG access channels. The community exercises complete editorial control over PEG access channels and develops its own programming using its own production staff. The funding of PEG access channels is negotiated during initial franchising and license renewals.



Similar to PEG access, the objective of LO/community programming is to provide programming of immediate and current interest in the community. Examples of LO programming include meetings of local governmental bodies (e.g., city council and school committee meetings), local election coverage, school sports events and community activities. Continental has consistently won a high percentage of CableACE nominations and awards (the cable industry's highest programming achievement), frequently topping the industry list in both areas, even though budgets are relatively modest.

B. Mandatory Closed Captioning Of PEG And LO Programming Will Be Economically Prohibitive

The available evidence compels the conclusion that mandatory closed captioning would have a devastating impact on the quantity and quality of local programming. Falling hardest on LO studios which have the smallest budgets and audiences, mandatory closed captioning would, at the very least, significantly diminish hours of LO programming in all studios and force closure of some -- a perverse result.

The cost of closed captioning is far greater than the cost of PEG and LO programming. While Continental's approach to community programming has reduced the average cost of PEG and LO programming to approximately \$100/hour, closed captioning for live programming runs from \$120/hour to \$1,200/hour and for

prerecorded programming runs from \$800/hour to \$2,500/hour according to the NPRM.<sup>5</sup>

The effect of requiring closed captioning can be demonstrated best by using Marblehead, MA as a case study. Although the LO resources in this 6,500 subscriber cable system are fairly representative, Marblehead's MHTV-3 has excelled in local programming, receiving national recognition with awards and acknowledgments from the Alliance for Community Media, the National Cable Television Association ("NCTA"), the National Academy of Cable Programming, the New England Cable TV Association and MultiChannel News. MHTV-3 also was awarded the 1996 CableACE for "Best Overall Local Programming" for a small system.<sup>6</sup>

The mission of Marblehead's MHTV-3 is to respond to community needs. Therefore, the staff at MHTV-3 maintain close working relationships with town officials and citizens. Pursuant to the franchise agreement, the LO studio serves only Marblehead and is located in the high school. The annual LO operating budget

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<sup>5</sup> NPRM ¶¶ 18, 22. The \$2,500 upper limit for closed captioning of pre-produced programming cited in the NPRM may be low. In Marblehead, MA, Continental produces a prerecorded magazine show on topics of importance for persons with different types of disabilities. The programming is produced in cooperation with a non-profit organization which helps disabled persons. Each year, Continental produces ten half-hour shows. Although, the full cost of closed captioning each half-hour show is \$1,336, grant funding has reduced Continental's cost to \$668 for a half hour program. Because of the lead time required for inserting closed captioning in pre-produced programming, this programming must be produced two months in advance of being aired.

<sup>6</sup> See Appendix A for additional information and a sample programming week for MHTV-3.

for 1995, the year in which the CableACE award-winning programming was produced, was \$90,000, or \$13.50 per subscriber.

Although the franchise agreement in Marblehead requires a minimum 520 hours of LO programming each year, MHTV-3 airs many more hours. In 1995, MHTV-3 aired 884 hours of programming (245.5 live hours and 638.5 prerecorded hours) at an average cost of \$102/hour. The 1995 programming included: programming on local events produced by Continental staff (317 hours); Selectmen's; Town and other municipal meetings (141.5 hours); productions by Marblehead High School and School Committee meetings (78 hours); school sports (83 hours); community programming produced by citizens after receiving technical training from Continental (171 hours); and taped LO programming from neighboring communities (93.5 hours). Live programming includes Selectmen's meetings (3 to 5 hours); biweekly School Committee meetings (2.5 hours each); auctions (approximately 12 hours per year); live sporting events (approximately 12 hours per year); live call-in studio shows (averaging 6 hours per year); and election night coverage (averaging 3 to 6 hours per year). Some weeks as much as 12 to 15 hours or 68% of programming could be live. Almost none of the live programming is scripted rendering reliance on electronic newsroom ("ENR") captioning impossible.<sup>7</sup> Further, the vast majority of the prerecorded LO programming features local events taped hours or at most days earlier. Almost none of the programming is recorded well enough in advance to allow for the insertion of closed captioning by an outside

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<sup>7</sup> Purchase of \$5,000 in ENR captioning equipment would totally absorb the annual capital budgets of Continental's local programming studios.

source. Indeed, if forced to wait two months for insertion of closed captioning, the relevance of the programming would be lost.

The foregoing facts compel the conclusion that forcing closed captioning on Marblehead's MHTV-3 would deplete most of its LO budget. The costs of closed captioning of live or prerecorded programs dwarf the costs of producing the original programming itself. Even using the lowest cost cited in the NPRM for the closed captioning of prerecorded programming of \$800/hour, achieving closed captioning of even 5% of pre-produced programming in Marblehead would cost over \$25,000 annually, or 28% of the annual operating budget. And, inserting closed captioning in only 18% of MHTV-3's prerecorded programming would consume the entire operating budget. Using an average cost of \$660/hour for closed captioning of live programming,<sup>8</sup> the deleterious effect on MHTV's live LO programming would be analogous.

Closed captioning would result in similar harmful impacts in virtually all communities. Continental's review of LO budgets for 47 studios serving 1.7 million subscribers showed that the average cost of LO programming was \$79/hour in 1994. On average, these studios produced 225 hours of original programming each month, of which 30% was live and 70% was pre-produced.

The foregoing analysis shows that imposing even a minimal closed captioning requirement would be prohibitively expensive for LO and PEG access programming. Because the cost of closed captioning vastly outweighs the cost of the LO

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<sup>8</sup> NPRM ¶ 20.

programming itself, this very important community programming would be totally eliminated in many instances. At the very least, mandatory closed captioning would force a Solomon-like choice between a significant reduction in the quantity and quality of LO programming or increased rates as operators are compelled to pass on the mandated costs to consumers. Cable operators also would find themselves in default of their LO license commitments because the unexpected costs of mandated closed captioning would severely reduce the number of hours they could produce. PEG and LO programming undoubtedly meet the exception requirements in Section 713(d)(1).

## II. THE RESPONSIBILITY FOR CLOSED CAPTIONING PROPERLY RESIDES WITH THE PROGRAM PRODUCER OR PROGRAM NETWORK RATHER THAN THE PROGRAM DISTRIBUTOR \_\_\_\_\_

To ensure that closed captioning services are delivered in the most efficient manner possible, the Commission should establish rules which mandate the insertion of closed captioning at the most economical point in the overall cycle of video production and delivery. In almost every case, the most economical point to insert closed captioning into video programming is during program production. Many commenters in the Commission's previous Notice of Inquiry in this same docket provided cost and other information which supports this conclusion.<sup>9</sup> Additionally, this position is consistent with the House Report on the subject which

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<sup>9</sup> In the Matter of Closed Captioning and Video Description of Video Programming, Notice of Inquiry, 11 FCC Rcd. 4912 (1995) ("NOI"). See, e.g., Comments of National Broadcasting Company, Inc., filed herein March 15, 1996 at 12; Comments of CBS, Inc. filed herein March 15, 1996 at 21-22; Comments of the National Association of Broadcasters, filed herein March 15, 1996 at 8; Comments of Home Box Office, filed herein March 15, 1996 at 12.

states: “It is clearly more efficient and economical to caption programming at the time of production and to distribute it with captions than to have each delivery system or local broadcaster caption the program.”<sup>10</sup>

As the Commission notes in its NPRM,<sup>11</sup> Section 713(b) of the 1996 Act provides the Commission with jurisdiction over both program distributors and program owners with regards to the closed captioning of “video programming first published or exhibited after the effective date of [the Commission’s] regulations.”<sup>12</sup> The Commission should use its jurisdiction to ensure that captioning is supplied at the most economical point in the production and delivery cycle. For most new programming, that means at the time of program production.

The record in this docket demonstrates that closed captioning is most economically inserted at the time of program production. This is true for two primary reasons: 1) it is much easier and faster to translate an electronically-provided script into closed captions rather than to have a captioning stenographer retype it; and 2) captioning resources are much more abundant, and therefore less costly, in areas where television programs and films are produced.

In spite of the evidence in the record, the Commission proposes that the responsibility for closed captioning should be placed on video programming providers.<sup>13</sup> This proposal is inconsistent with the previous record in this docket and

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<sup>10</sup> House Report on H.R. 1555 (Report No. 104-204) at 114.

<sup>11</sup> NPRM ¶ 29.

<sup>12</sup> 47 U.S.C. § 713(b)(1).

<sup>13</sup> NPRM ¶ 28.

the specific language in the House Report on this matter. The Commission bases its proposal on the belief that a program purchaser, i.e., the program distributor, has the power or is in the best position to ensure that the programming they distribute is closed captioned.<sup>14</sup> Unfortunately for consumers, the ultimate bearers of closed captioning costs, the Commission misses the point. Captioning for new video programming must be required at the time of production. Without such a mandate, there is no way to ensure that closed captioning will be inserted where it is most efficient and cost effective. Where captioning must be inefficiently inserted after the fact, consumers will ultimately bear the higher costs.

The Commission has the requisite authority under Section 713(b) to require program owners to include closed captioning in their productions. This is the most logical and efficient place to do so. To do otherwise and place the ultimate responsibility on program distributors is contrary to sound regulatory policy and common sense. The concept of placing dual responsibility for captioning on both program producers and program distributors is also untenable. This methodology would simply encourage finger-pointing and additional disputes between parties as to who is ultimately responsible for closed captioning. A direct line of responsibility is more efficient and enforceable in most cases. Here, the line of responsibility for closed captioning insertion is most appropriately placed with program producers and owners.

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<sup>14</sup> Id.

To impose regulatory requirements on program distributors which are not completely under their control is unjust and could have serious consequences beyond the closed captioning issues under consideration in this docket. Cable operators are required by most franchise agreements to comply with all applicable laws and regulations. A violation of a federal law or rule, even an inappropriate one, can provide a franchising authority with sufficient cause to question a cable operator's suitability for franchise renewal under Section 626(c)(1)(A) of the Communications Act or might even be viewed as grounds for franchise revocation. The loss of a franchise as a result of an inappropriately placed regulatory mandate is severe and unjust punishment. The Commission must factor these potential results in to any decision to place ultimate closed captioning responsibilities on program distributors.

Program distributors will also have their own appropriate responsibilities. For their part, program distributors must be technically capable and willing to ensure that the provided closed captioning is passed through to consumers. The Commission has previously mandated such requirements for cable operators and open video system providers with regards to their must-carry obligations.<sup>15</sup> Cable operators have traditionally passed-through closed captioning on all program signals carried on their systems. This responsibility is appropriately expanded to ensure the pass-through of all captioning by program distributors where technically feasible.

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<sup>15</sup> 47 C.F.R. §§ 76.62 (e), (f), and 76.1506(k).



### III. A TEN YEAR TRANSITION PERIOD IS NECESSARY TO PROPERLY IMPLEMENT CLOSED CAPTIONING

As the Commission notes in its NPRM, captioning resources are currently limited and are likely inadequate to handle the large growth of captioning requirements over the next several years. It is important that the Commission allow sufficient time for such resources to be developed. It is also important that the Commission not create a situation where the demand for captioning resources exceeds the supply by imposing a rapid transition schedule on program providers. This will only serve to raise captioning costs for all program providers and ultimately for consumers or result in poor quality captioning done to simply meet the Commission's deadlines. A ten-year transition period with additional lead-time at the start of implementation is more appropriate and will better serve the needs of providers and consumers equally.

As the Commission has recognized, significantly increased demand for closed captioning resources will result from the mandatory requirements imposed by Congress. Many new positions will be created in the closed captioning industry, requiring specialized equipment and training. The significant expansion of this industry will require time to develop. Currently, only trained court reporters are capable of transitioning immediately to stenocaptioning. This is a fairly difficult skill to master and training involves learning specialized equipment and techniques. Sufficient time must be allowed so that a skilled workforce is adequately trained and prepared for the large amount of captioning work to be required in the future. A ten-year period with three years to ramp-up is

appropriate given the fact that this industry does not currently exist and extensive training is required to gain the necessary skills in this area.

Additionally, a shorter transition period may result in a loss of quality programming for viewers and lower overall quality closed captioning services. As program producers and distributors endeavor to meet the ever-increasing captioning requirements, it is possible that some desirable programming services may be abandoned if early captioning costs are inflated because of a lack of adequate captioning resources. This programming may or may not reappear once captioning resources are more generally available. Also, it is possible that closed captioning resources could be deployed without adequate training or experience. This could result in lower overall quality in closed captioning services. Such a result would neither serve program providers nor the public interest. A longer transition period will help protect programming choices and overall closed captioning quality.

IV. **CLOSED CAPTIONING REQUIREMENTS SHOULD BE  
IMPOSED ON A CHANNEL-BY-CHANNEL BASIS; EACH  
PROGRAMMING SERVICE MUST ENSURE THAT IT  
MEETS ALL CLOSED CAPTIONING REQUIREMENTS**

Given U S WEST's belief that it is more appropriate for the Commission to make program producers rather than program distributors responsible for captioning, it follows that each individual program service must be able to certify compliance with any future closed captioning rules. If, however, the Commission ultimately decides that distributors should be responsible for verifying compliance, U S WEST supports a channel-by-channel compliance measurement system for

several reasons. First, to apply the captioning measurement system-wide or on an aggregate channel basis could potentially distort negotiations between program producers and distributors. Particularly if the Commission decides to make the distributor responsible for compliance, it places an additional and potentially thorny issue on the negotiation table -- namely the percentage of closed captioning offered. In an extreme case such a rule might incent a stronger program producer to delay captioning, under the theory that the distributor will be forced to find other programmers to pick up the slack left by the non-captioning service.

Unless each channel is measured separately, it also complicates channel line-up decisions. Although on the surface the system-wide measurement appears to give a cable operator greater flexibility, in the end it adds undue complexity. Establishing channel line-ups and adding new channels is a balance of a number of factors: 1) viewer interest; 2) the existing mix of programming; 3) requirements for must-carry; 4) requirements for leased access and PEG access; 5) available channels; and 6) types of tiers offered. Closed captioning, if required system wide, will become its own separate litmus test for carriage. The operator could be forced to carry a channel, which may be of little interest or value to its subscribers, simply to make its closed captioning goals. The easier and more appropriate solution is to require each programming service to meet the closed captioning requirements on its own.

V. COMMISSION IMPOSED STANDARDS FOR ACCURACY AND QUALITY OF CLOSED CAPTIONING ARE UNNECESSARY AT THIS TIME

The Commission seeks comment on whether it should adopt specific rules or standards for the accuracy or quality of closed captioning. Such standards are unnecessary at this time and could impose additional burdens on program providers during implementation of mandatory closed captioning. A more appropriate course of action at this time would be for the Commission to monitor closed captioning quality and assess the need for specific standards at a later date. Additionally, if parties find that a significant amount of closed captioning is inaccurate or deficient, the Commission's proposed complaint process provides an adequate avenue for the resolution of most issues.

Closed captioning standards would also be difficult to measure and enforce, especially at a time when significant burdens will already be placed on an industry which will undergo enormous expansion in a very short time. There is currently no measurement technologies or equipment which could be used to accurately review programs for closed captioning errors. All such reviews would have to be done through the use of human resources. This would be both inefficient and potentially subjective. The Commission should focus its efforts, and the efforts of the industry, on the implementation of closed captioning. Should additional consideration be warranted at a later date, accuracy and quality standards can be considered at that time.

VI. CLOSED CAPTIONING COMPLIANCE SHOULD BE ENFORCED THROUGH THE COMMISSION'S EXISTING COMPLAINT PROCESS

Consistent with the recommendations above, U S WEST believes that most matters concerning the implementation and accuracy of closed captioning should be handled through the Commission's existing complaint process. Additionally, U S WEST is in favor of the Commission mandating a private resolution process for complaints prior to their filing at the Commission. Most complaints can be handled through private negotiation and dispute resolution. There is no need to involve valuable Commission resources in the majority of these matters. A specific period of time should be provided for private dispute resolution. U S WEST recommends a period of 60 days. If the parties were unable to resolve the complaint after that time, they would then be allowed to file a formal complaint at the Commission.

VII. CONCLUSION

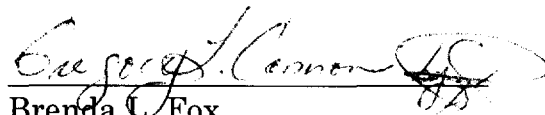
The Commission must appropriately balance several important public interest goals in this proceeding. While it is important that the Commission increase the program viewing options of millions of Americans with hearing and visual disabilities, it is also important that the "voice of the community" outlets encompassed by PEG and local origination programming are protected. The Commission should exempt these programming classes from mandatory captioning requirements. The Commission must also ensure that captioning is performed where it is most efficient and cost effective. The Commission should mandate that program owners insert captioning at the time of program production. Captioning requirements should be imposed on a channel-by-channel basis so that they do not

become a bargaining chip or have a negative impact on program line up decisions. Finally, the Commission should allow a ten-year transition period to provide sufficient time for the necessary closed captioning resources to develop. By following these recommendations, the Commission can fulfill the mandate of Congress, foster efficient and cost effective captioning of video programming, and ensure that important local public programming outlets are protected.

Respectfully submitted,

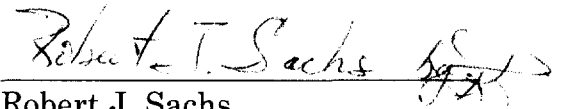
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## APPENDIX A

## **MHTV-3**

Continental's "Community Television" philosophy combines both Local Origination and Community Access production on one channel. Hands-on community involvement in MHTV has been tremendous and growing for 10 years now. Original programming hours average over 17 per week, far exceeding license requirements, but indicative of townwide interest in the medium. MHTV serves, not only as a chronicler of Town events and a live eye on municipal meetings, but as a respected resource for news and information, as a means of raising funds for charitable causes, through telethons and auctions, and as a facility for community and High School education.

Working with a small staff, a limited budget, and shared facilities, MHTV has found it necessary and advantageous to maintain close working relationships with Town citizens & officials. MHTV believes its primary mission is to respond to community needs, and we have succeeded in using our existing staff and facilities to achieve this goal.

Continental has placed a staff in Marblehead whose priorities include being active in the life of the Town they serve. And, MHTV has indeed become an important thread in the fabric of the Marblehead community.

Last year, the Alliance for Community Media selected MHTV-3 as a finalist in the category of ***"Overall Commitment to Local Origination (under \$400,000 subscribers)"***.

Marblehead, MA is a historic seacoast community 18 mi. north of Boston. It is as densely populated as a small city, yet every attempt is made to retain the flavor and independence of a small town - both in attitude and government. In Marblehead, democracy still exists in its purest form - the open Town Meeting, and Marbleheaders have always been intensely involved in this process.

When MHTV began operations, residents were provided with a means to further examine and expand their participation in preserving the traditions and quality of life in Marblehead. Residents embraced this opportunity wholeheartedly.

Governmental, educational, public service, and individual programming on MHTV reflect the diverse interests of the Marblehead population and exhibit the genuine affection Marbleheaders have for their Town.

- MHTV programming has received **national recognition** with awards and public acknowledgement from the Alliance For Community Media, the National Cable Television Association, the National Academy of Cable Programming, the New England Cable TV Association and the MultiChannel News.
- MHTV programming is distributed to many other towns in Massachusetts.
  - "Ready, Willing, Enable!", providing information on issues relating to persons with disabilities, is seen in over 100 towns, served by more than a dozen different cable companies. The show is closed-captioned through grant funding.
  - "Focus on Health", produced in cooperation with a local Medical Center, is seen in 11 other towns in its service area.
  - Other series and individual shows are regularly seen in neighboring towns, even those served by other cable companies.
- **Public Affairs and News** programming have been particularly successful in covering Marblehead's complex fiscal troubles and explaining the difficult decisions that accompany them.



- **Interactive programming** capabilities provide viewers with direct access to a variety of informational sources. Call-in shows address timely, even emergency situations arising in the community.
  - **Long-running series** are widely viewed and highly regarded, as evidenced by the many letters we receive.
  - Tapes of selected MHTV shows have been **donated to the local Public Library** for their archives and for circulation to the general public, extending our audience beyond just cable subscribers.
- 

The clips on the submitted tape shows the range and breadth of MHTV's programming:

- ◆ **'HEADLINER - The News of Marblehead** - weekly news program covering Marblehead's political, economic & social issues, including segments featuring town events, sports senior & youth activities.
- ◆ **OFFICER DAVE'S SAFETY CLUB** - A fast-paced 1/2-hour series (10 per year), teaching local kids about safety. Produced in partnership with the Marblehead Police Dept. Has won on regional & State awards.
- ◆ **"SOLUTIONS WE CAN LIVE WITH: Making Peace With Diversity"** - Live, call-in show with representatives from Marblehead's Afro-American, Jewish and Gay communities.
- ◆ **"PEER MEDIATION: Peaceful Solutions in a Climate of Conflicts"** - Documentary focusing on the problems of violence & intolerance at Marblehead High School & the steps being taken to deal with it.
- ◆ **SAILOR'S DIARY** - Dramatization & Documentary about the WW II experiences of a nationally known Marblehead artist who designed the first GI JOE Action figure.
- ◆ **YOUNG DANCE COMPANY OF AMERICA: "Dancing In Reflections"** - Annual Performing Arts special produced by *Community Access* user. Featuring local dance group of national renown.
- ◆ **READY, WILLING, ENABLE!** - Monthly magazine show (10 per year) focusing on issues relating to the disabled and their families or caretakers. This show has garnered national interest & is distributed to over 100 cities & towns in Massachusetts & New Hampshire. (Closed-captioned through grant funding).
- ◆ **YMCA CABLE TV AUCTION PROMO** - Promoting the 5th Annual Y Auction, raising over \$17,000 in 5 hours of live auction action. One of a series of promos nominated for a Massachusetts Community TV Award.
- ◆ **MHTV-3 GAMEDAY Marblehead High School Sports** - Extensive MHTV coverage of High School varsity sports - featuring each season's major and minor sports.
- ◆ **THE ARTIST & HIS MODELS** - Monthly Art Instruction series (10 per year) , featuring a local artist painting and drawing Marblehead personalities.
- ◆ **MARBLEHEAD CHRISTMAS WALK 1995** - A unique Marblehead tradition bringing together all segments of the community. MHTV covers three days of activities throughout the town.